

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

EMILY SLOAN, CHRISTINA AIKMAN, JASON)	-X
PELSZYNSKI, WILLARD SCHULMEISTER III,)	
MICHAEL SLADEK, ROBERT LESSER, and)	
STEVEN WEAVER,)	
))	
Plaintiffs,)	
))	
-against-)	STATEMENT OF
))	RELATEDNESS
THE CITY OF NEW YORK; ASSISTANT)	
POLICE CHIEF ANTONIO BOLOGNA, POLICE)	ECF CASE
OFFICER KEITH MORSE, Shield No. 22766;)	
POLICE OFFICER TIMOTHY CAI, Shield No.)	
2127; POLICE OFFICER VINCENT)	05 Civ. 7668
FORTUNATO, Shield No. 23450; POLICE)	
OFFICER NEIL RODRIGUEZ, Shield No. 21015;)	
POLICE OFFICER JEAN VERGIN, Shield No.)	
09984; JOHN DOES; RICHARD ROES; HUDSON)	
RIVER PARK TRUST,)	
))	
Defendants.)	

Now come the plaintiffs by and through their counsel, JEFFREY A. ROTHMAN, Esq., JEFFREY E. FOGEL, Esq., and JOHN WARE UPTON, Esq., and make the following statement of relatedness pursuant to Rule 15 of the Rules for the Division of Business Among Judges of the United States District Court for the Southern District of New York.

1. This is a civil rights action in which the plaintiffs seek redress for violation of their constitutional rights suffered by them through the actions of agents of the CITY OF NEW YORK and HUDSON RIVER PARK TRUST during the course of the Republican National Convention (RNC) in late August / early September, 2004.

2. This case raises similar claims concerning the actions of the defendants as those raised in the putative class action *MacNamara v. City of New York, et al.*, 04 Civ. 09216 (KMK), currently pending before Judge Karas, and the numerous other individual

actions also pending before Judge Karas stemming from the RNC. These claims include, *inter alia*, claims for 1st Amendment violations, claims for false arrest and related constitutional torts, claims for the conditions of confinement at Pier 57 and 100 Centre Street, and claims for unreasonable length of detention.

3. The undersigned has already participated in discussions with the Assistant Corporation Counsel heading the City of New York's defense team in these matters, Jay Kranis, Esq., concerning the parameters of consolidated discovery in these actions.

4. Permitting this case to be filed as related to *MacNamara* and the other RNC cases currently pending before Judge Karas will promote a substantial savings in judicial resources.

Dated: August 31, 2005
New York, New York

/s/
JEFFREY A. ROTHMAN, Esq.
(JR-0398)
575 Madison Avenue, Suite 1006
New York, New York 10022
(212) 348-9833; (212) 937-8450

JEFFREY E. FOGEL, ESQ.
(JF-3948)
232 Warren Street
Brooklyn, NY 11201
(718) 243-2039

JOHN WARE UPTON, ESQ.
(JU-9065)
70 Lafayette Street
New York, NY 10013
(212) 233-9300

Attorneys for plaintiffs